

EXHIBIT 17

Videoconference Deposition via Zoom of Schaffer, Haley - 7/31/2020
3M Company v. Matthew Starsiak, et al.

UNITED STATES OF DISTRICT COURT
DISTRICT OF MINNESOTA

Court File No: 0:20-CV-01314 (SRN/DTS)

3M COMPANY,

Plaintiff,

vs.

MATTHEW STARSIAK,

AMK ENERGY SERVICES LLC, and

JOHN DOES 1 THROUGH 10, whose

true names are largely unknown,

Defendants.

VIDEOCONFERENCE DEPOSITION VIA ZOOM OF
HALEY SCHAFFER

Taken: July 31, 2020

By Mary Piehl, B.S.Ed, RPR

1 message from Mr. Starsiak that Mr. Motalebi
2 forwarded to him, and he said he recalled
3 receiving it. I also -- but did not have a copy
4 of it anymore. I asked him if he -- about his
5 conversation with Eric Schuster when Eric Schuster
6 first reached out to him by phone.

7 Q. And do you know when the call, the voicemail from
8 Mr. Starsiak was made to Mr. Motalebi?

9 A. I believe's around May 7th, give or take a couple
10 days, or maybe a week or two. I don't recall the
11 first date. It was before I talked to
12 Mr. Starsiak, I know that.

13 Q. Okay. And did you discuss anything else with
14 Mr. Fong in preparation today?

15 A. No, I did not.

16 Q. And other than Mr. Fong and Mr. Motalebi, did you
17 have any other discussions, other than your
18 counsel, about your deposition testimony today?

19 A. No, I did not.

20 Q. Okay. And you mentioned that you reviewed some
21 documents in preparing for today's proceeding.
22 Can you identify what those documents were?

23 A. Correspondence.

24 MS. BUNDY: Sorry, Ms. Schaffer. If I
25 might add, to the extent that those documents